

**REMARKS**

At the outset, the Examiner is thanked for the thorough review and consideration of the pending application. The Office Action dated June 15, 2006, has been received and its contents carefully reviewed.

By this response, claims 13, 23-25 and 28 are hereby amended. Claim 14 is hereby cancelled. Claims 33-44 are hereby added. No new matter is added. Accordingly, claims 13, 16, 18; 23-25, 28-30 and 32-44 are currently pending. Reexamination and reconsideration of the pending claims is respectfully requested.

In the Office Action, claims 13, 16, 18, 23-25, 28-30 and 32 are rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. Claims 13, 16, 18, 23-25, 28-30 and 32 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,901,399 to Moinpour et al. (hereinafter "Moinpour") in view of U.S. Patent No. 6,202,658 to Fishkin et al. (hereinafter "Fishkin") and U.S. Patent No. 6,261,378 to Hashimoto et al. (hereinafter "Hashimoto").

Applicants respectfully traverse the rejections of claims 13, 16, 18, 23-25, 28-30 and 32 under 35 U.S.C. § 112, first paragraph. In particular, the Office Action states that the original disclosure is silent regarding a cylindrical body and a central axis. Without conceding to the merits of the rejection, Applicants submit that the Examiner's rejection over of the use of "cylindrical body" and "central axis" is moot in view of the amendments to the claims.

Applicants respectfully traverse the rejections of claims 13, 16 and 18 and reconsideration is respectfully requested. Claims 13, 16 and 18 are allowable at least in that each of these claims recites a combination of elements, including, for example, "brushing the side surface of the substrate with a side surface of a cylindrical brush that rotates based on a axis of rotation, wherein the axis of rotation is substantially parallel to the linear direction of the substrate movement". Moinpour, Fishkin and Hashimoto, singly or in combination, do not teach or suggest at least this feature of the claimed invention. Accordingly, Applicants respectfully request withdrawal of the rejections of claim 13, 16 and 18.

Applicants respectfully traverse the rejections of claims 23-25 and reconsideration is respectfully requested. Claims 23-25 are allowable at least in that each of these claims recites a combination of elements, including, for example, "removing foreign substances on a first side

surface of the substrate by jetting deionized water that carries ultrasonic waves onto the first side surface of the substrate with a first water jet device and brushing the first side surface of the substrate with cleaning brushes that rotate based on an axis of rotation while moving the substrate continuously in a linear direction” and “removing foreign substances on a second side surface by jetting deionized water that carries ultrasonic waves onto the second side surface of the substrate with a second water jet device”. Moinpour, Fishkin and Hashimoto, singly or in combination, do not teach or suggest at least this feature of the claimed invention. Accordingly, Applicants respectfully request withdrawal of the rejections of claim 23-25.

Applicants respectfully traverse the rejections of claims 28-30 and 32. Claims 28-30 and 32 are allowable at least in that each of the claims recites a combination of elements, including, for example, “brushing at least two opposing side surfaces with cleaning brushes that rotate based on an axis of rotation along the at least two opposing side surfaces of the substrate in substantially a straight line”. Moinpour, Fishkin and Hashimoto, singly or in combination, do not teach or suggest at least this feature of the claimed invention. Accordingly, Applicants respectfully request withdrawal of the rejections of claim 28-30 and 32.

Additionally, claims 33-37 are allowable in that they depend from claims 23 and 28, which are allowable.

Also, claims 38-44 are allowable in that each of these claims recites a combination of elements neither taught or suggested by the cited prior art.

Applicants believe the foregoing amendments place the application in condition for allowance and early, favorable action is respectfully solicited.

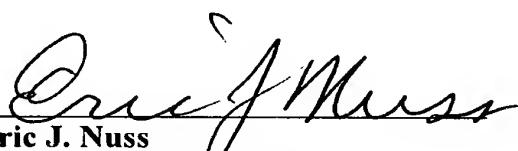
If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at (202) 496-7500 to discuss the steps necessary for placing the application in condition for allowance. All correspondence should continue to be sent to the below-listed address.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. § 1.136, and any additional fees required under 37 C.F.R. § 1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911. *A duplicate copy of this sheet is enclosed.*

Respectfully submitted,

Dated: September 13, 2007

By

  
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